

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re FIRSTENERGY CORP. SECURITIES
LITIGATION

) No. 2:20-cv-03785-ALM-KAJ

)

) CLASS ACTION

)

This Document Relates To:

) Judge Algenon L. Marbley

) Magistrate Judge Kimberly A. Jolson

ALL ACTIONS

) Special Master Shawn K. Judge

)

MFS Series Trust I, et al.,

) Case No. 2:21-cv-05839-ALM-KAJ

)

Plaintiffs,

)

vs.

)

)

)

FirstEnergy Corp., et al.,

)

)

)

Defendants.

)

)

Brighthouse Funds Trust II – MFS Value
Portfolio, et al.,

)

) Case No. 2:22-cv-00865-ALM-KAJ

)

Plaintiffs,

)

)

vs.

)

)

)

FirstEnergy Corp., et al.,

)

)

)

Defendants.

)

**FIRSTENERGY CORP.’S MOTION TO COORDINATE OBJECTIONS
TO THE SPECIAL MASTER’S RULINGS RELATED TO
DISCOVERY OF PRIVILEGED INTERNAL INVESTIGATIONS**

PLEASE TAKE NOTICE that Defendant FirstEnergy Corp. (“FirstEnergy”) hereby requests that, as set out in the accompanying Proposed Order, the Court consolidate the deadlines for objections to (i) Order by Special Master on Motion to Compel, dated November 29, 2023 (ECF No. 571); (ii) Order denying FirstEnergy leave to file an amended declaration, dated November 30, 2023 (ECF No. 575); (iii) the Special Master’s report and recommendation on the denial of leave to file an amended declaration (ECF No. 575), as directed in this Court’s Order dated December 1, 2023 (ECF No. 578); and (iii) the Special Master’s order or report and recommendation on FirstEnergy’s Motion for Reconsideration of the Special Master’s November 29 and 30, 2023 Orders (ECF No. 592).

The motion is based upon the accompanying memorandum of law in support thereof, Declaration of Hilary M. Williams, and such other evidence and argument as the Court may consider.

Dated: December 13, 2023

Respectfully,

/s/ Thomas D. Warren

Thomas D. Warren, Trial Attorney (0077541)
WARREN TERZIAN LLP
30799 Pinetree Road, Suite 345
Pepper Pike, OH 44124
Telephone: (213) 410-2620
tom.warren@warrenterzian.com

Robert J. Giuffra, Jr. (*pro hac vice*)
Sharon L. Nelles (*pro hac vice*)
David M.J. Rein (*pro hac vice*)
Beth D. Newton (*pro hac vice*)
Nicholas F. Menillo (*pro hac vice*)
Hilary M. Williams (*pro hac vice*)
Tasha N. Thompson (*pro hac vice*)
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000

Kamil R. Shields (*pro hac vice*)
SULLIVAN & CROMWELL LLP
1700 New York Avenue, N.W.
Suite 700
Washington, D.C. 20006
Telephone: (202) 956-7040

Counsel for Defendant FirstEnergy Corp.

DECLARATION OF SERVICE

I certify that the foregoing was filed electronically on December 13, 2023. Notice of this filing will be sent to all electronically registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Thomas D. Warren
Thomas D. Warren (0077541)

Counsel for Defendant FirstEnergy Corp.